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02/17/96
03/02/1749

9	Subclass
244	Class
ISSUE CLASSIFICATION	

PATENT NUMBER

3954295

5931295

5931295

U.S. UTILITY PATENT APPLICATION

WLS/2 O.I.P.E.

PATENT DATE

SCANNED

LR Q.A. RG

SEP 21 1999

SECTOR	CLASS	SUBCLASS	ART UNIT	EXAMINER
	244	9	3641	Kar

FILED WITH: DISK (CRF) FICHE
(Attached in pocket on right side (Lg))

PREPARED AND APPROVED FOR ISSUE

ISSUING CLASSIFICATION

ORIGINAL		CROSS REFERENCE(S)			
CLASS	SUBCLASS	CLASS	SUBCLASS (ONE SUBCLASS PER BLOCK)		
244	9	244	19	31	
INTERNATIONAL CLASSIFICATION		416	18		
864C 29/00					

Continued on Issue Slip Inside File Jacket

TERMINAL DISCLAIMER	DRAWINGS	CLAIMS ALLOWED
<input type="checkbox"/>	Sheets Drawg. 2731 Figs. Drawg. 33 Print Fig. 11	Total Claims 4 Print Claim for O.C. 1
<input type="checkbox"/> a) The term of this patent, subsequent to _____ (date) has been disclaimed.	NOTICE OF ALLOWANCE MAILED 11/18/99	
<input type="checkbox"/> b) The term of this patent shall not extend beyond the expiration date of U.S. Patent No. _____	ISSUE FEE 2125.00	
<input type="checkbox"/> c) The terminal _____ months of this patent have been disclaimed.	Amount Due 60500 Date Paid 11/04	
ISSUE BATCH NUMBER N68		

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Form PTO-436A
(Rev. 10/97)

T. MILLS
QUERY
703-2826

ISSUE FILE
(LABEL AREA)

ISSUE FILE FILE

(FACE)

EFILED IN OFFICE
CLERK OF STATE COURT
HENRY COUNTY, GEORGIA
STSV2021000972
VAL
JUL 15, 2021 09:58 AM

IN THE STATE COURT OF HENRY COUNTY

STATE OF GEORGIA

DANA MEAD-GOINS,)	
)	
Plaintiff,)	
)	CIVIL ACTION
v.)	
)	FILE NO. STSV2021000972
QUIKTRIP CORPORATION, JOHN)	
DOE CORPORATION, and JOHN DOE)	
INDIVIDUAL,)	
)	
Defendants.)	
)	

DEMAND FOR TWELVE MEMBER JURY TRIAL

COMES NOW, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, and demands a trial by a twelve member jury in the above styled action.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060-1979
T: 770-422-3233
F: 770-423-4199

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Candace Alynn Hill Duvernay, Esq.
Hill Duvernay and Associates, LLC.
110 Habersham Drive
Fayetteville, Georgia 30214

This 15th day of July, 2021.

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698

4818-3705-7299, v. 2

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INDIVIDUAL,)	
)	
Defendants,)	
)	

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY

Pursuant to Uniform State Court Rule 5.2, the undersigned hereby certifies that on the date shown, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, served copies of the following pleadings:

1. Defendant's First Continuing Interrogatories to Plaintiff;
2. Defendant's First Request for Production of Documents to Plaintiff;
3. Defendant's First Request for Admissions to Plaintiff; and
4. Defendant's Responses to Plaintiff's Request for Admissions.

by depositing same in the United States Mail, properly addressed and with sufficient postage affixed thereon, to the following counsel of record:

Candace Alynn Hill Duvernay, Esq.
Hill Duvernay and Associates, LLC.
110 Habersham Drive
Fayetteville, Georgia 30214

This 15th day of July, 2021.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

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 Plaintiff,) CIVIL ACTION
)
 v.) FILE NO. STSV2021000972
)
 QUIKTRIP CORPORATION, JOHN)
 DOE CORPORATION, and JOHN DOE)
 INDIVIDUAL,)
)
 Defendants.)

Lynne M. Pollicaro
Lynne M. Pollicaro, Clerk of State Court
Henry County, Georgia

DEFENDANT'S NOTICE OF FILING ORIGINAL DISCOVERY

COMES NOW, Defendant QUIKTRIP CORPORATION, appearing specially and without
submitting to the jurisdiction and venue of this Court, and files the following Original Discovery
with the Clerk of Court:

1.

Defendant's Responses to Plaintiff's First Request for Admissions.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
SEAN L. HYNES
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

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)

Plaintiff,

)

v.

)

QUIKTRIP CORPORATION, JOHN
DOE CORPORATION, and JOHN DOE
INDIVIDUAL,

)

Defendants.

)

CIVIL ACTION

FILE NO. STSV2021000972

DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS

COMES NOW, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, and responds to Plaintiff's First Request for Admissions as follows:

GENERAL OBJECTION

Defendant objects to the Request for Admissions served by Plaintiff along with the Complaint on the grounds that it is inappropriate for Plaintiff to serve such request for admissions along with the complaint. See Perez v. Miami-Dade Cnty., 297 F.3d 1255, 1266 (11th Cir. 2002). It is too early for Defendant, having not yet received the allegations, to perceive what facts should or should not be contested. It is further inappropriate for Plaintiff to re-serve the complaint in the form of Request for Admissions in order to require Defendant to admit or deny nearly every paragraph of a Complaint that it has already answered." Id.

1.

Defendant admits the averments contained in paragraph 1 of Plaintiff's Request for Admissions.

2.

Defendant admits the averments contained in paragraph 2 of Plaintiff's Request for Admissions.

3.

Defendant denies the averments contained in paragraph 3 of Plaintiff's Request for Admissions.

4.

Upon information and belief, and after reasonable inquiry, the information known or readily obtainable by Defendant is insufficient to enable Defendant to admit or deny the averments contained in paragraph 4 of Plaintiff's Request for Admissions.

5.

Defendant denies the averments contained in paragraph 5 of Plaintiff's Request for Admissions.

6.

Defendant denies the averments contained in paragraph 6 of Plaintiff's Request for Admissions.

7.

Defendant denies the averments contained in paragraph 7 of Plaintiff's Request for Admissions.

8.

Defendant denies the averments contained in paragraph 8 of Plaintiff's Request for Admissions.

9.

Defendant denies the averments contained in paragraph 9 of Plaintiff's Request for Admissions.

10.

Defendant denies the averments contained in paragraph 10 of Plaintiff's Request for Admissions.

11.

Defendant denies the averments contained in paragraph 11 of Plaintiff's Request for Admissions.

12.

Defendant denies the averments contained in paragraph 12 of Plaintiff's Request for Admissions.

13.

Defendant denies the averments contained in paragraph 13 of Plaintiff's Request for Admissions.

14.

Defendant denies the averments contained in paragraph 14 of Plaintiff's Request for Admissions.

15.

Defendant denies the averments contained in paragraph 15 of Plaintiff's Request for Admissions.

16.

Defendant denies the averments contained in paragraph 16 of Plaintiff's Request for Admissions.

17.

Defendant admits the averments contained in paragraph 17 of Plaintiff's Request for Admissions.

18.

Defendant admits the averments contained in paragraph 18 of Plaintiff's Request for Admissions.

19.

Defendant denies the averments contained in paragraph 19 of Plaintiff's Request for Admissions.

20.

Defendant admits the averments contained in paragraph 20 of Plaintiff's Request for Admissions.

21.

Defendant denies the averments contained in paragraph 21 of Plaintiff's Request for Admissions.

22.

Defendant denies the averments contained in paragraph 22 of Plaintiff's Request for Admissions.

23,

Defendant admits the averments contained in paragraph 23 of Plaintiff's Request for Admissions.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
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Georgia State Bar No. 381698
hynes@downeycleveland.com
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